

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES

v.

DANIEL THOMAS HERSL

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Case No.: GLR-17-106

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CONSENT MOTION TO CONTINUE SUPPLEMENTAL BRIEFING SCHEDULE

The defendant, Daniel Hersl, by and through counsel, Christopher Madiou, Esq., moves this Honorable Court to continue the filing deadline the Court imposed for supplemental briefing in Mr. Hersl's motion pursuant to 18 U.S.C. § 3582(C)(1)(A)(i). In support of this request, counsel states the following:

1. The Court previously ordered that supplemental briefing from the defense was due by September 19, 2024.
2. Undersigned counsel needs additional time to review the defendant's latest medical records and consult with the defense's medical expert regarding these records.
3. The government, through AUSA Matthew Phelps, consents to the continuance of this deadline.
4. For these reasons, counsel respectfully asks this Court to continue the supplemental briefing deadline for Mr. Hersl until on or before October 4, 2024, and that the government shall have one week to respond once the defense files its supplemental brief.
5. WHEREFORE, for the foregoing reasons, counsel respectfully request this Honorable Court continue Mr. Hersl's supplemental filing deadline until October 4, 2024, and that the government shall file its response one week after the defense has filed its brief.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'C Madiou', written over a horizontal line.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 19, 2024, a copy of the foregoing was sent via ECF to the United States Attorney's Office for the District of Maryland.

A handwritten signature in black ink, appearing to read 'C Madiou', written over a horizontal line.

Christopher Madiou, Esq.